

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 1:23-CV-22352-RNS

THE SMILEY COMPANY SPRL,

Plaintiff,

v.

THE INDIVIDUALS, PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

_____ /

MOTION FOR CLERK’S ENTRY OF DEFAULT

Plaintiff The Smiley Company SPRL (“Plaintiff”) by and through the undersigned counsel, and in compliance with the Court’s Order of Clerk’s Default Procedure (ECF No. 70), hereby requests that the Clerk enter default in this matter against the defaulting Defendants, the Individuals, Partnerships and Unincorporated Associations as identified on Schedule “A” attached hereto (collectively “Defaulting Defendants”) on the grounds that Defaulting Defendants have failed to appear or otherwise respond to the Complaint within either the time prescribed by the Federal Rules of Civil Procedure or the time set forth by the Court for Defendants to respond. (Declaration of Javier Sobrado in Support of Plaintiff’s Request for Clerk’s Entry of Default (“Sobrado Decl.”) at ¶ 7, filed concurrently herewith.)

On July 24, 2023, Defendants were served with their respective Summons and copies of the Complaint via e-mail pursuant to the Court’s Order authorizing alternate service of process. (Sobrado Decl. at ¶ 4; *see also* ECF No. 29, Proof of Service on file with the Court reflecting that Defendants were served). Defendants were also served via publication by posting a true and

accurate copy of the Complaint, Issued Summons and all other filings in this case on the website <https://www.dropbox.com/scl/fo/ftazryndvzffe6xefmbdx/h?dl=0&rlkey=5c3ljw0qeo5yfxfruk1srrsz5>.

Id.

Defendants have not filed a response or otherwise appeared in this matter. Sobrado Decl., at ¶ 4. The time allowed for the Defaulting Defendants to respond to the Complaint has expired. (*Id.*, at ¶ 5.) Neither Plaintiff nor the Court has granted the Defaulting Defendants an extension of time to respond to the Complaint, nor has any Defaulting Defendant requested same. (*Id.* At ¶ 6.) The Defaulting Defendants have failed to answer or otherwise respond to the Complaint or serve a copy of any Answer or other response upon Plaintiff's attorneys of record. (*Id.* at ¶ 7.) Plaintiff is informed and believes that none of the Defaulting Defendants could be considered infants or incompetent persons. (*Id.* at ¶ 8.) Plaintiff is informed and believes that the Servicemembers Civil Relief Act does not apply. (*Id.*)

WHEREFORE, Plaintiffs hereby request that default be entered against Defendants, the Individuals, Partnerships and Unincorporated Associations as identified on Schedule "A" attached hereto.

Date: September 8, 2023

Respectfully submitted by,

Javier Sobrado

Javier Sobrado (Fla. Bar No. 44992)

Attorney Email address: jsobrado@brickellip.com

Arthur Robert Weaver (Fla. Bar No. 92132)

Attorney Email Address: rweaver@brickellip.com

THE BRICKELL IP GROUP, PLLC

1101 Brickell Avenue, South Tower, Suite 800

Miami FL, 33131

Telephone: (305) 728-8831

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby Certify that the Defaulting Defendants are being served today, September 8, 2023, with a copy of this request for entry of Clerk's Default and accompanying Declaration of Javier Sobrado at the email addresses provided by their third-party platform and/or via emails to their attorneys, as set forth below in the Service List, and via posting these documents at the website: <https://www.dropbox.com/scl/fo/ftazryndvzffe6xefmbdx/h?dl=0&rlkey=5c3ljw0qeo5yfxfruk1srrsz5>.

Defendants that have entered an appearance through counsel are being served with these documents via the Court's CM/ECF system.

/ Javier Sobrado /

SERVICE LIST

D. No.	Seller Name	Servcie Email(s)
1	zerogiving	1021863860@qq.com;
3	Treasure001	973794509@qq.com;
6	skdlxm10	skdlxm10@gmail.com;
7	Daniel D Murphy	n1ar2g@163.com;
9	luck eastore	369151929@qq.com;
10	Tianwen Yu	948983803@qq.com;
12	zhangmingli6107	lueliaobixo@163.com;
14	yinhanzhiyi	3323983113@qq.com;
16	Seilershop.com	nigginz@yahoo.de ;
17	MattHurley23	jannayqbxpelj@gmail.com;
18	zhangzhen49915	fdfpv56@163.com;
19	YUAN8956KAI	hzjb69@163.com;
20	surprise xie	q13645938180@163.com;
21	tianhao0999	danzhuo7675@163.com;
22	duomino	appleme8810@163.com;
23	GP3399	17770093269@189.cn;
24	ATmcer	atmcer@hotmail.com;
25	hualiling6017	nlopw7@163.com;
27	xiulanssx	goushoune3@163.com;
30	guangzhouhongqiyouxiangongsi	linzka1@126.com;
33	liaoyingjie50304	nu3514211@163.com;
34	mafaldashop	andrespereirabusines2019@gmail.com;

D. No.	Seller Name	Servcie Email(s)
35	liuganggang2	3297330454@qq.com;
36	DIYEmbroideryPatchShop	info@a-godeagle.com;
38	yiwutaiwo	1547529148@qq.com;
39	jiangfengping456	13178652113@163.com;
40	Rsdir	jiunaxin@163.com;
42	Yencounter	945538893@qq.com;
43	libiaoqwe	m15190289060@163.com;
45	Seyduchhs	calebcalebsambarmo@gmail.com;
46	YN fashion store	liyaningtk@outlook.com;
47	liwentuo6205	lutuo740607@163.com;
49	SHT Online Store	431936406@qq.com;
50	qqnlv1shop	qqnlv1@163.com; 'Bonnie Li' <bli@bonnielilaw.com>;
51	Juliusmgl	ffmqnc578gy3@163.com;
52	Lucky stra boy	120437594@qq.com;
53	xingdongpai	799341482@qq.com;
54	xiaoxiaobaitun	xiaoxiaobaitun@outlook.com;
57	Gong Donghui	3474834674@qq.com;
58	JINJIAHUI FOREIGN TRADE CO.,LTD	410888001@qq.com;
59	linhuaneng fashion	linguwm36@aliyun.com;
61	APEXICE	2122965215@qq.com;
62	Reallgo	lkf514936@163.com;
63	Anne Mall e-commerce	3456000435@qq.com;
64	sweetby	xujing01@hotmail.com;
65	duwanxin56356896	mzwwad810uf01@163.com;
66	sunjuanyue02213	dui8390@163.com;
68	Well88	wellforo@163.com;
69	Baby002	3063836500@qq.com;
71	LuoDeZhi	pz0152@163.com;
72	linlongxiang1134	dong52814501@163.com;
73	yangyan4663	haosha682719@163.com;
74	ekfoadkfjkqw	yig2798@163.com;
76	yinxians	njbs41@163.com; 'Bonnie Li' <bli@bonnielilaw.com>;
77	vrthggfb	tmtk7902737z@163.com;
78	wangnan1234	mengmishankr@163.com;
79	jinhuai1234	mike15027195@163.com;
80	yadana	sya009@126.com;

D. No.	Seller Name	Servcie Email(s)
81	dnfPOHAR	eleanoremens@gmail.com;
83	G6G5G8	rphfs53@163.com;
84	8tailuhu-a	yuyongjun1a1@126.com;
86	yupanli628	kmxer006xtc9@163.com;
87	actume fashion	13802516752@163.com;
89	3C Electronic Gift Shop	wingshell@outlook.com;
90	Jcgdxgxfhcgvcgchvhcgv	jcgdxgxfhcgvcgchvhcgv@gmail.com;
91	DMZ clothes grop	dmz1511@163.com;
92	LHL story	a791350264@163.com;
93	zhangjinyou6821	aoyunpai211@163.com;
96	qingjunfeng44071	yuandu362286@163.com;
97	Power Sport World	wcz.1226@aliyun.com;
98	wangpeng9	cangyanren1@163.com;
99	Gransep	pcac30@163.com;
100	Lminer	lmin1350290427@163.com;
101	wujuan Store	cuy2321@163.com;
102	Julimia	hanjuanjane@163.com;
103	limeixiaoyi	745286900@qq.com;
104	liaoshunying9026	svasc2@163.com;
105	Guaragandabou	faw5811@163.com;
106	zlddp	wywish53@sina.com;
107	wanqidedain	tengfei20201688@163.com;
108	zh52465	yin48571914che@163.com;
110	Les_Tresors_de_Lily	jlp@lestresorsdelily.com;
111	Barbara Booth	songz080375@163.com;
112	EstarF	574328784@qq.com;
113	panliuming fashion	jungege11@aliyun.com;
114	shanshandeshop	13588693770@163.com;
116	vpower	lianzhenxi2008@126.com;
117	hdnjshuyfdu	tongxinba3620060@163.com;
119	tan weiike	2018811935@qq.com;
120	liruitang23970	gejjd40@163.com;
123	newwule666	1014483944@qq.com;
124	Csndice Jewelry	vcdd075154@163.com;
125	shajsdaass	dic5391@163.com;
126	uskbtkshop	uskbtk@163.com;
127	xyz fashions	xyzxyl81@126.com;
128	WangZiXun	ww7670@163.com;

D. No.	Seller Name	Servcie Email(s)
129	WLL fashion	790254090@qq.com; 'Bonnie Li' <bli@bonnielilaw.com>;
130	ureiewggjooq569	982952494@qq.com;
131	shitingyu4939	yillb42@163.com;
132	tangrenjing01420	rih3170@163.com;
133	Yadangwaxia	ye52578@163.com;
134	gonago	belensimich895@gmail.com;
135	fbdsghdsydu	otun0735165832@163.com;
137	Worshiperstore	worshiperstore@gmail.com;
138	ritaccpvyrfs	ritaccpvyrfs@yahoo.com;
139	SalCo	vitaliygrechuha@gmail.com;
140	guangzhouliangridengshiyouxiangongsi	605900568@qq.com;
142	Peacefulness	garrisonroycejfg282@gmail.com;
143	liuxiaohai39058	nafmz56@163.com;
144	huangzeyu36354	pdqka00@163.com;
145	dingzhiqiang55289	ssoqd76@163.com;
146	Cizicoco store	amioyes2021@163.com;
147	yangguang30928	mig7580@163.com;
148	COCBONI	cocboni@126.com;
149	Lucky Leaf Bath Bombs	sales@luckyleafbathbombs.co.uk;
150	108mpfda	3391793541@qq.com;
151	haiyinstore	haiyin6262@aliyun.com;
152	la5skv	la5skv@163.com;
153	Universal small shops	915314410@qq.com;
154	CHENG-mm	m16571310775@163.com;
155	LiHongQiao	jf8758@163.com;
156	Cute potatoes	942302589@qq.com; Edward Bi <ebi@sherinianlaw.net>;
157	Serendipity LIAO	593530111@qq.com;
158	fdgfd	luzongwei116@163.com;
159	tuanli electronic commerce co., LTD	401685092@qq.com;
160	EARLFAMILY	earlfamily@126.com;
162	surprise yong	q13625954785@163.com;
163	WhschCoa9	yancang9631226yi@163.com;
164	Abby Townsend	mngztip4ks@163.com;
165	jiangdidedian	jiang5732200937@163.com;
166	liujiahaovc	qdesc51@163.com;
167	Lynsie	tupkbt@163.com;

D. No.	Seller Name	Servcie Email(s)
168	Sknfodndkdcnzofksodk68	sknfodndkdcnzofksodk68@gmail.com;
169	qiuchao97444	bsmgr55@163.com;
170	Queey	710963865@qq.com;
171	helinlin1787	xrypp03@163.com;
172	chongpeicheng45285	cpnel21@163.com;
173	wzchunlai	chunlai199@163.com;
174	liqinsong0625	yangang865377@163.com;
175	liuyongzhi	vivatigers@163.com;
176	xiaojunnanzhuang123	xiaojununn@163.com;
177	xxiong shop	d656234@163.com;
178	7007	zk315999@126.com;
179	xiaoyanzis	1557268945@qq.com;
180	langworthjenni185	langworthjenni185@gmail.com;
181	UrbanLobes	newton1234@qq.com;
182	liverstone	liverstone@163.com;
184	ella trendy store	bestwishella@outlook.com;
185	Remiel Jewelry	261787224@qq.com;
187	wanmeizhenzhu A	huyangu2323@163.com;
188	flamingcloud666	flamingcloud666@outlook.com;
189	jinche2852	vvnbr3@163.com;
190	dgfffdb44	mo0870204@163.com;
191	Dannishijie	sduyf12@163.com;
192	FSdfgx	yangjiacang7687@163.com;
193	Ladies or Girls	3070851278@qq.com;
194	Decoration home store	y982164627@163.com;
195	CHENbibi	nan13559808371@163.com;
196	Qiaoyufeng	smmse8@163.com;
197	SebastianeMirabelleXpV	wxig37@163.com;
198	pnhvhrus	pnhvhrus@yahoo.com;
199	Nna3	18767182612@163.com;
200	A&K STORY	ak_story88@yahoo.com;
201	wangpengyi55329	tcjnj91@163.com;
202	wellfolove	wellforlove@126.com;
203	gaoyuling	gao18617085387@163.com;
204	XIAO JUN MA	shaojun-865@163.com;
205	Shirtbude	sebastian-kurdum@web.de;
206	liudawnag23936	ninvp74@163.com;
207	AiHua835	rou876640639202@163.com;

D. No.	Seller Name	Servcie Email(s)
208	liuhao2134	butengluqpf@163.com;
209	linbingzheng	wishyy13@163.com;
210	zhuore5dfgfdg	zhuore5181717@163.com;
211	LUCK ZL	zp376416@163.com;
212	yujunhaya	tqv752@163.com;
214	zhangsimeng	jiubi572586570@163.com;
215	Gregory L Stipovich	ktfq79@163.com;
216	liuyang2450	vrjfp7@163.com;
219	yanpuxi	yanpuxi47472@163.com;
221	luyuhua2494	jrtqx85@163.com;
222	TANGSHUNAGJJ	shashi981464412@163.com;
223	PingLincreativegiftshop	s57114630nai@163.com;
224	alexzandraaitken60027231	alexzandraaitken60027231@gmail.com;
226	Festival Accessories Store	heshisheng19820104@tom.com;
227	dingshang	qupeng916@foxmail.com;
228	gaoxuehua89156	mbydv87@163.com;
229	Tumoni store	2671378930@qq.com;
230	samcnbr	zhangao83282zhiw3@163.com;
232	gggion	paixing03@163.com;
233	Qiangming	janeming1993@hotmail.com;
234	RUINUO-MQ	ruinuo2019@163.com;
235	AllSimplelove	vanluongp058@gmail.com;
236	TTT123	3075929471@qq.com;
238	molochsh	cvvt53@163.com;
239	caoshuang3251	yongsutuo755@163.com;
240	liujian2224	wqju84@163.com;
242	TIAN ZHU STORE	siqiao936894057@163.com;
243	tianmeng1359	wef352@163.com;
244	dsjfisufyhsidf	zhishengre56497@163.com;
246	AlanBaptiste	lillianhoganawbbz@yahoo.com;
247	qingshengfanghua	diaocheng96118@163.com;
248	NANALIKEO	wei13559807397@163.com;
249	kindly feelings	18530777686@139.com;
250	Macabre	parkandyanx310@gmail.com;
251	nkhiguttutu	kanshi315149255@163.com;
252	guozhipin	landroadwind@outlook.com;
254	Foyali	2936498281@qq.com;

D. No.	Seller Name	Servcie Email(s)
255	maozhiy098l	hexian877yun@163.com;
256	ZJP1990	3200638198@qq.com;
257	xuejzlsda	ptvgr11@163.com;
258	zhouyanfeng3884	jly591@163.com;
259	Cute Stickers For Kids	xiejuhua@163.com;
260	Doggy Steven Store	1137481600@qq.com;
261	Weldon Williams	janemoorevnsfe@yahoo.com;
262	Bigteesweet	vmhieu82@gmail.com;
263	XiaoH Shop	pp19171664336@outlook.com;
264	enqingfuzhuangdian	ran32155lou@163.com;
265	Luyun mashatac	etkjfca@163.com;
266	Men Watch Sports	youhuistore@163.com;
267	wiriya445	wiriya445wish168@163.com;
269	chenlingchao3161	mtnnh63@163.com;
270	YUANQIANGGEGE8	avbng260911@sina.com;
272	mingxiaoxu	hdueiws@163.com;
275	maxiaonan00762	dza2156@163.com;
276	yiwuhaomiao	chengx2017@163.com;
277	KDIF-SJIF.JVID	uhgbxn@163.com;
278	LiuAnYuan	tuka24@163.com;
279	wanyida castle	wanyida_good@163.com;
280	Miulee Fashion Store	onegirl1121@163.com;
281	xyzabc123	q19857916869@163.com;
282	zhangguotao14776	yua3305@163.com;
283	chenjian6987	vbigq73@163.com;
284	MaGuanQi	ew1490@163.com;
285	renchaoL	rz44kr@163.com;
286	Window of the love	hb19845201314@163.com;
287	WanShunLiu	sw2901@163.com;
288	renyufei1234	qti54i@163.com;
289	vivatee	nguyenthithanh981989@gmail.com;
290	Xu Xiaoyu graffiti stickers	jvllv@163.com;
293	keertao55213	flszh74@163.com;
294	pengyunjiawo	syci444@163.com;
296	zhanQfengQQ	fen13958253559@sina.com;
297	Karlakai	npi84456@163.com;
299	LillianSanchez	perryhoracezpn@yahoo.com;
300	S&S House	244386234@qq.com;

D. No.	Seller Name	Servcie Email(s)
302	Moontees	moontees33@gmail.com;
303	Smart wardrobe	990974438@qq.com;
304	dengmengwei45203	oemol27@163.com;
305	Pursuit of Happyness International	154692833@qq.com;
306	meilijiazhuan	hjjw7524@aliyun.com;
307	Embird	embird2015@126.com;
308	JABG	jiabingwish@163.com;
309	Lovely Decor	1241231034@qq.com;
310	qixianyun37104	meirao579856163@163.com;
311	XLIU	1244360487@qq.com;
312	TUMENG99	928302782@qq.com;
313	xukai8524	pniug9@163.com;
314	LHmart	dearhk8608@gmail.com;
315	qinpeng1234	naihe1386119@163.com;
316	liutao24129	kangyi911511@163.com;
317	Joyous goods	330398451@qq.com;
321	Jummioni	mcgowinlostmcgowin@gmail.com;
324	WeiJingFu	pp2538@163.com;
325	LEONON	1329139723@qq.com;
326	11dian	lk11223300@163.com;
328	renguofei	musccarlandstore@foxmail.com;
329	chenkai39715	jscow70@163.com;
330	AlKEmeng335	zhongzdvygvo156@163.com;
331	Yiwu ingot Club Co.	350607705@qq.com;
333	sunflower123	peiyings305@163.com;
335	graphictopic	graphictopic@126.com;
336	Ybety Accessories	j17056221960@outlook.com;
337	ZhangHaYun	weibu5402878294381@163.com;
338	Rodney M Pospisil	vqoamk700925@126.com;
339	huxiulis	xuannizh610835@163.com;
341	liangminqing	1700981306@qq.com;
342	xukouqun0616	qiaopade528487@163.com;
343	NCX's store	ncx3304799512@163.com;
344	likuansop	1163176697@qq.com;
345	kishuqing	wdd13521422578@163.com; 'Yong Chen' <ychen@ambizlaw.com>;
346	Bisami Flagship Store	1512285830@qq.com;
348	Fashion Century	madonae@163.com;

D. No.	Seller Name	Servcie Email(s)
349	ZLYsticker	2019102170003@whu.edu.cn;
350	he su qiong	r7s71z0@163.com;
352	eric_qin store	qinhuiy@126.com;
354	PECG-haha	363215608@qq.com;
355	Nayely G Calderon Alamillo	wallisviolavizk@yahoo.com;
356	gongmingli90872	bzdsf11@163.com;
357	Yhuahua	yc853169072@sina.com;
358	Prebble E-commerce company	boa3214789@hotmail.com;
359	jiang fashion	christyfjr@sina.com;
361	W store	juwu1990@163.com; 'Bonnie Li' <bli@bonnielilaw.com>;
362	chunlang	320739663@qq.com;
363	gexinhu57785	fiyqz39@163.com;
364	To be best 1	th65186363@163.com;
365	shaoyingying8	jie01236747@163.com;
367	Lambleigh0032	sewv45@163.com;
368	LuolianJia	mt7068@163.com;
369	chenyouyan0910	rntjf5@163.com;
370	EvangelineGriffitheYyM	ntxj81@163.com;
371	mangboo	a812007807@163.com;
372	Minliqijian	hu74095@163.com;
373	chenbing1994	chenbing9408@outlook.com;
374	jianlin supper-market	deborahbra@sina.com;
375	YANG YANG STORE	aiwunz254207@163.com;
377	JINhuang00	jin18650240903@163.com;
378	jiuosjiloutimozi	pangyoumeng438@163.com;
379	kerosin	hytqnz@163.com;
380	cwqiani196	lan20180424@163.com;
381	zzp546	cui907wang9@163.com;
384	qiancraftkits	404619080@qq.com;
386	KLCPPY	zhucaiyin@hotmail.com;
387	RaoZongYue	xiaobensmallben@aliyun.com;
388	zhangxuanli55187	dvtry22@163.com;
390	mangkoy	ycqxl5376@163.com;
391	DGW	258022129@qq.com;
394	Yuanfanglin	nzgw22@163.com;
395	Cute Ornament World	yxr13738931283@163.com;
396	st02134b	st02134b@gmail.com;

D. No.	Seller Name	Servcie Email(s)
397	Mongolcaprexx	qzkx38@163.com;
398	wensha store	274610360@qq.com;
400	zhangxiaoying31217	lij1952@163.com;
401	chenxilu	mm_hsjl_6@qq.com;
402	cityshopping	3554123827@qq.com;
403	ziyurong Store	sej4213@163.com;
406	Royal1878	574381819@qq.com;
407	shangwenbin fashion	caiwngk578@aliyun.com;
408	duanfuqing07253	lyhpsz84@163.com;
409	Donna Manning34	bertelainealnjmi@yahoo.com;
410	dingjianlan	wish64@126.com;
413	OCEAN BLUE1	z18720186941@sina.com;
414	luolimei	ghwufd@163.com;
416	JehuTanydx	tan940173290@163.com;
418	Electrphon shop	jd1880594176@163.com;
419	wangxiuli6950	jkuld66@163.com;
420	zhaosicong2262	zhizhiheih@163.com;
421	YIJIN21	21ccmccm@sina.com;
422	tianyouxing46003	mlvrs75@163.com;
423	yun888	mongyun418@163.com;
425	tfyeree	weigu7713@163.com;
426	LikeFashionShop	binvp.fba@gmail.com;
427	sumail-89337	faultfinder2020@163.com;
428	WJSJEWELRY	1205403842@qq.com;
429	Alicech16	cgreatbetter@126.com;